IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

DE SHAWN DRUMGO,)
Plaintiff,)
v.) C.A. No. 14-1135 CFC
SGT. WILLIAM KUSCHEL,)
Defendant.)

CERTIFICATE OF COMPLIANCE WITH WORD COUNT LIMITATIONS AND TYPEFACE REQUIREMENTS

The undersigned counsel for Defendant hereby certifies that: (i) the Renewed Motion for Judgment as a Matter of Law and to Alter or Amend Judgment, or in the alternative, for a New Trial has a word count of 62 words; (ii) the Memorandum of Law has a word count of 3,590 words; and (iii) these two documents have a typeface of Times New Roman at 14-point font. The word counts exclude the parts exempted by the Federal Rules of Civil Procedure and the District of Delaware Local Rules.

STATE OF DELAWARE DEPARTMENT OF JUSTICE

/s/ Zi-Xiang Shen

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